

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
SOUTHERN DIVISION**

**DANIEL B. O'KEEFE and
CELESTE A. FOSTER O'KEEFE,
Individually and d/b/a THE DANCEL GROUP, INC.;
and THE DANCEL GROUP, INC.**

PLAINTIFFS

VS.

Civil Action No. 1:08cv600 HSO-LRA

**STATE FARM FIRE AND CASUALTY
COMPANY; MARSHALL J. ELEUTERIUS;
and John and Jane Doe Defendants A-H**

DEFENDANTS

**DEFENDANTS, STATE FARM FIRE AND CASUALTY
COMPANY AND MARSHALL J. ELEUTERIUS' AMENDED AND THIRD
SUPPLEMENTAL DESIGNATION OF EXPERT WITNESSES**

COMES NOW Defendants, State Farm Fire and Casualty Company and Marshall J. Eleuterius (hereinafter "Defendants"), by and through counsel of record and files their Amended and Third Supplemental Designation of Expert Witnesses with supplements appearing in *bold italic* print and in support thereof would state unto this Court as follows:

- 1. Mr. Martin Rivers
Rivers Appraisal Service
13220 Wind Rose Circle
Gulfport, MS 39503**

Mr. Rivers is designated as an expert having general knowledge in the field of real estate appraisal. A copy of Mr. Rivers' Curriculum Vitae bates number O'Keefe-ExpertRpt-Rivers-100021, Fee Schedule and Trial History bates number Rivers-Fee-100000, Report with attachments bates number O'Keefe-ExpertRpt-Rivers-100000 – O'Keefe-ExpertRpt-Rivers-100025, FTI Interactive bates number O'Keefe-FTI Interactive-Hanover-100000 – O'Keefe-FTI Interactive-Hanover-100040 and Dancel-FTI Interactive-Rodriguez-100000 – Dancel-FTI Interactive-Rodriguez-100039 and supporting documents are being produced to counsel opposite this date.

2. Scott L. Douglass, Ph.D., P.E.
University of South Alabama
Department of Civil Engineering
850 Cherry Court
Mobile, AL 36688

Dr. Douglass is designated as an expert having general knowledge in the field of civil engineering and having specialized knowledge regarding coastal engineering research and post-storm damage assessment. A copy of Dr. Douglass' Curriculum Vitae bates number O'Keefe-ExpRpt-Douglass-100016 - O'Keefe-ExpRpt-Douglass-100038, Fee Schedule and Trial History bates number Douglass-Fee-100000 – Douglass-Fee-100001, Report with attachments bates number O'Keefe-ExpRpt-Douglass-100000 – O'Keefe-ExpRpt-Douglass-100077, FTI Presentations bates number O'Keefe-Douglass FTI Presentation-Hanover-100000 – O'Keefe-Douglass FTI Presentation-Hanover-100042 and O'Keefe-Douglass FTI Presentation-Rodriguez-100000 – O'Keefe-Douglass FTI Presentation-Rodriguez-100040, FTI Interactive bates number O'Keefe-FTI Interactive-Hanover-100000 – O'Keefe-FTI Interactive-Hanover-100040 and Dancel-FTI Interactive-Rodriguez-100000 – Dancel-FTI Interactive-Rodriguez-100039 and supporting documents are being produced to counsel opposite this date.

3. William D. Hager
Insurance Metrics Corporation
2360 NW 45th Street
Boca Raton, FL 33431

Mr. Hager is an expert in insurance agency related matters and is providing testimony in this action regarding same. A copy of Hager's Curriculum Vitae bates number O'Keefe-ExpertRpt-Hager-100020 – O'Keefe-ExpertRpt-Hager-100038, Trial History bates number O'Keefe-ExpertRpt-Hager-100039 – O'Keefe-ExpertRpt-Hager-100043, Report with attachments bates number O'Keefe-ExpertRpt-Hager-100000 – O'Keefe-ExpertRpt-Hager-100043, Mr. Hager's fee is \$495.00 per hour, FTI Interactive bates number O'Keefe-FTI Interactive-Hanover-100000 – O'Keefe-FTI Interactive-Hanover-100040 and Dancel-FTI

Interactive-Rodriguez-100000 – Dancel-FTI Interactive-Rodriguez-100039, and supporting materials are being produced to counsel opposite this date.

4. **Mark Watson**
Jeremy South
Jenkins Engineering, Inc.
Post Office Box 2101
218 South Thomas Street, Suite 209
Tupelo, Mississippi 38803

Mr. Watson and Mr. South are designated as experts having general knowledge in the field of civil engineering and specialized knowledge regarding structural engineering design and failure. A copy of Watson's Curriculum Vitae and Trial History bates number Watson-CV-100000 – Watson-CV-100034, Fee Schedule bates number Watson/South-Fee-100000, FTI Interactive bates number O'Keefe-FTI Interactive-Hanover-100000 – O'Keefe-FTI Interactive-Hanover-100040 and Dancel-FTI Interactive-Rodriguez-100000 – Dancel-FTI Interactive-Rodriguez-100039, Mr. Watson's report bates number O'Keefe-ExpertRpt-Watson/South-100000 – O'Keefe-ExpertRpt-Watson/South-100035, supplemental report bates number O'Keefe-ExpertRpt-Watson/South-100036 – O'Keefe-ExpertRpt-Watson/South-100038, ***supplemental report bates number O'Keefe-ExpertRpt-Watson/South-100039 - 100088*** and Dancel-ExpertRpt-Watson/South-100000 – Dancel-ExpertRpt-Watson/South-100020, FTI Presentation bates number O'Keefe-Watson FTI Presentation-Hanover-100000 – O'Keefe-Watson FTI Presentation-Hanover-100031 and supporting documentation are being produced to counsel opposite this date.

5. **Joey Hines, CPA, CFFA**
Tann, Brown & Russ Co., PLLC, CPA
415 E. Capitol Street
Jackson, MS 39201

Mr. Hines is designated as an expert having knowledge in the field of accounting. A copy of Mr. Hines' curriculum vitae bates number Hines-CV-100000 –Hines-CV-100001, fee schedule bates number Hines-Fee-100000 and trial testimony bates number Hines-Testimony-

100000 – Hines-Testimony-100001, Mr. Hines report bates number O’Keefe-ExpertRpt-Hines-

100000 – O’Keefe-ExpertRpt-Hines-100021 are being produced to counsel opposite this date.

6. **Gary Dailey**
Cornerstone Construction, Inc.
1720 Woodside Circle
Tupelo, MS 38801
662-842-8563

Mr. Dailey is designated as an expert having knowledge in the field of home construction, repair and remodeling. Mr. Dailey’s curriculum vitae and trial testimony bates number O’Keefe-ExpertRpt-Dailey-100002, fee schedule bates number O’Keefe-ExpertRpt-Dailey-100003, report bates numbers O’Keefe-ExpertRpt-Dailey-100000 - 100064 are being produced to counsel opposite this date. Defendants’ have sought leave from the Court to amend. [330]

RESPECTFULLY SUBMITTED, this the 3rd day of December, 2009.

WEBB, SANDERS & WILLIAMS, P.L.L.C.
363 NORTH BROADWAY
POST OFFICE BOX 496
TUPELO, MISSISSIPPI 38802
(662) 844-2137
DAN W. WEBB, MSB 7051
B. WAYNE WILLIAMS, MSB 9769
J. DOUGLAS FOSTER, MSB 100641

BY: /s/ J. Douglas Foster
J. DOUGLAS FOSTER

CERTIFICATE OF SERVICE

I, J. Douglas Foster, one of the attorneys for Defendants, State Farm Fire and Casualty Company and Marshall J. Eleuterius, do hereby certify that I have this date electronically filed the foregoing with the Clerk of the Court using the ECF system, which sent notification of such filing to the following ECF participant:

**Christopher C. Van Cleave, Esq.
CORBAN, GUNN & VAN CLEAVE, PLLC.
146 Porter Avenue (39530)
Post Office Drawer 1916
Biloxi, Mississippi 39533-1916**

THIS, the 3rd day of December, 2009.

BY: /s/ J. Douglas Foster
J. DOUGLAS FOSTER